

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In re Matter of	)	
	)	
Digital Television Distributed	)	
Transmission System Technologies	)	MB Docket No. 05-312
	)	

To: The Commission

**COMMENTS OF HOLSTON VALLEY BROADCASTING CORPORATION**

Pursuant to Section 1.415 of the Commission's Rules, the undersigned hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in the above-referenced proceeding. Holston Valley Broadcasting Corporation (Holston) is the licensee of full service UHF television stations, WKPT-TV and WKPT-DT, Kingsport, Tennessee, and of a number of Class A and low power television (LPTV) stations and AM and FM radio stations also located in the Tri-Cities (Johnson city/Kingsport/Bristol),TN/VA television DMA. Holston is a member of the "Coalition for DTS" (the Coalition), which is filing more extensive comments in the above-referenced proceeding.

The purpose of the instant pleading is to bolster the request that the Commission not prohibit Class A, LPTV, and TV translator, stations from utilizing Distributed Television System ("DTS") technology. Holston's television operations are located in the heart of Appalachia, home of some of the most mountainous topography east of the Rocky Mountains. The line between a classic DTS system and the use of on channel

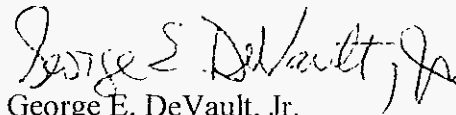
boosters is blurred in a region with such rugged topography; however, the Commission is urged not to rule out the use of either methodology in assisting Class A, LPTV, and translator licensees to reach their potential audiences, portions of which are often secluded in remote valleys and hollows.

While in the minds of some individuals, Class A, LPTV, and translator stations, are stereotyped as being mini-powered facilities serving tiny geographic areas, in fact such UHF facilities often operate with tens of thousands of watts ---- indeed up to 150,000 watts ---- effective radiated power and may operate from sites thousands of feet above average terrain projecting coverage contours scores of miles using the Commission's traditional coverage prediction methodology. Geographic pockets lacking service are common in such circumstances. Boosters can fill those pockets. DTS can allow the coverage of the principal transmission facility to be shaped so as to serve those areas it can best serve, while remote DTS transmitters generally with lesser power can be used to cover different areas (within the predicted coverage of the main transmitter when operating at maximum power). The principal is no different in the Class A, LPTV, and translators arena than in the full power world.

Should the Commission not feel it appropriate to establish DTS rules for low power entities in the current NPRM, Holston urges the Commission to proceed *post haste* to initiate another proceeding to deal with DTS for such stations and in the interim to

consider the requests of Class A, LPTV, and translator station licensees to construct DTS systems under special temporary authorizations.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "George E. DeVault, Jr.", with a stylized flourish at the end.

George E. DeVault, Jr.

President

HOLSTON VALLEY BROADCASTING CORPORATION

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February 6, 2006